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September 7, 2021

U.S. Department of Transportation, Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Amendment to Exemption No. 18813, and docket number FAA- 2021-0078, Petition for Exemption to Conduct Unmanned Aircraft Systems (UAS) Operations Allowed by Special authority for certain unmanned aircraft systems. Title 49 U.S.C. § 44807, and 14 C.F.R. Part 11 to Authorize Commercial Agricultural- Related Services with UAS Weighing 55 Pounds or More.

A. SUMMARY:

Volitant Technologies, LLC., DBA Volitant Drone Technology Solutions, an agricultural services company (hereafter referred to as Volitant Tech), and pursuant to Title 49 U.S.C. § 44807, Special authority for certain unmanned aircraft systems and 14 C.F.R. Part 11, hereby respectfully requests to amend their Petition for Exemption to add the DJI AGRAS T30 unmanned aircraft systems ("UAS") weighing over 55 pounds but no more than 168.65 lbs maximum takeoff weight, for agricultural operations and vegetation control. The operations will be conducted within and under the conditions outlined herein, or as may be established by the FAA, as required by Title 49 U.S.C. § 44807.

Currently, Volitant Tech has an approved Petition for Exemption under Part 107 for agricultural aircraft operations using the DJI Agras MG-1P, Exemption No. 18871 and an approved petition pursuant to Title 49 U.S.C. § 44807, for DJI Agras T-16, Exemption No. 18813 docket number FAA-2021-0078. Volitant Tech's Training Manual, Flight Operations Manual, and safety manuals have already been submitted and are a part of the approved Exemption No. 18813. Volitant Tech has also petitioned to amend Exemption No. 18813 to add the DJI Agras T20.

In this amendment, the requested exemption would permit the operation of no more

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than one DJI AGRAS T30, per Pilot in Command (PIC), by petitioner, under controlled conditions in predetermined airspace that is, 1) Limited in scope 2) Controlled as to access by mission essential personnel only. Grant of the requested exemption is based upon the concise direction expressed within Title 49 U.S.C. § 44807; the added authority granted by the Act, as amended; an equivalent level of safety regarding flight operations as expressed herein, and significant cost savings achieved by transitioning from traditional manned aerial resources to UAS's. The petitioner respectfully requests that the FAA grant the requested exemption without delay. Petitioner will operate the DJI AGRAS T30 while keeping the documents required by the regulations at the ground control station and immediately accessible to the (PIC) and adding of the registration number to the UAS fuselage.

The name and address of the Petitioner is:

Volitant Technologies, LLC.

The primary contact for this petition is:

5123 I Road
Dunbar, NE 68346
Attn: Kevin Knorr

In support of this Petition for Exemption, Volitant Tech will submit the following associated UAS operating documents:

- DJI Agras T30 Quick Start Guide
- DJI Agras T30/T10 Safety Guide Lines
- DJI Agras T30 Release Notes dated 7/27/2021
- DJI AGRAS T30 Operating Manual
- DJI AGRAS T30 Intelligent Battery Station Manual

All of these documents will be submitted on a confidential basis under separate cover, pursuant to 14 C.F.R. § 11.35(b), as the documents contain confidential commercial and proprietary information that Volitant Tech has not and will not share with others. The information contained in this material is not generally available to the public and is protected from release under the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*

B. BACKGROUND OF PETITIONER AND MANUFACTURER

Volitant Technologies, LLC is a diversified provider of agricultural equipment, parts, and services for a wide variety of Government and commercial clients throughout the State of Nebraska. Volitant Tech will be utilizing both drones under 55 lbs and over 55 lbs for spraying and spreading application of liquid herbicides, fungicides, granular products, seeds, and pesticides on agricultural crops such as corn, soybeans, wheat and rice.

Volitant Tech assesses the major benefits to the general public are 1) reduction in injury to ground based applicators in challenging terrain, 2) reduced exposure to chemicals for applicators, 3) reduction in chemical drift compared to manned aircraft

application, 4) reduced risk to flight crew compared to manned aircraft, 5) reduced exposure of surrounding beneficial vegetation, 6) more environmentally friendly application with reduced noise, 7) selective use of chemicals for a safer more targeted application, and 8) better value for the agricultural and commercial clients.

The UAS for the purposes of this petition is the DJI AGRAS T30.

Volitant Technologies, LLC will use a DJI AGRAS T30, manufactured by DJI. DJI is a wholly owned subsidiary of Shenzhen Dajiang Baiwang Technology Co., Ltd. DJI is a high-tech manufacturing facility specializing in unmanned aerial vehicles. They have an unparalleled presence in the UAS market with steadfast commitment to R&D, a culture of constant innovation, and a focus on transforming complex technology into easy-to-use devices.

In 2016, Dajiang Baiwang passed the ISO 9001:2015 Quality Management System Certification and in 2017 passed the SGS ISO 14001:2015 Environmental Management System Certification.

DJI's offices can now be found in the United States, Germany, the Netherlands, Japan, South Korea, Beijing, Shanghai, and Hong Kong. As a privately owned and operated company, DJI focuses on its vision, supporting creative, commercial, and non-profit applications of their technology.

Sales of the DJI Agras T30 have occurred in China, Southeast Asia, and Korea for the last year, with a combined total of 4,006,834 hours flown and 61,160,188 flights without any recorded incidents. Commercial applicators and farmers all across the world, have used the DJI T30 to spray nearly 131,789,536 acres this last year.

C. DJI AGRAS T30 SAFETY FEATURES AND SPECIFICATION.

Enhanced safety features, and specifications of the T30 are included in the attached proprietary documents. Volitant Tech requests an exemption for the purpose of operating Unmanned Aircraft Systems (UAS) weighing 55 pounds or more, but no more than and 168.65 lbs maximum take-off weight, to provide commercial agricultural-related services in the United States.

With the exception of firmware updates providing enhancements to the flight control application, the T30 flight controls are essentially identical to those of the already approved T16. A list of these updates is included in the attached confidential information.

D. CONCLUSION

For the foregoing reasons, Volitant Tech respectfully requests that the FAA grant this amendment to add the DJI Agras T30. Should you have any questions, or if you need additional information to support Volitant Tech Petition, please do not hesitate to contact the petitioner listed above.

